

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

MAR 14 2018
CLERK, U.S. DISTRICT COURT
By Deputy

UNITED STATES OF AMERICA

No. 4:18-MJ-162

v.

JOSE BRYAN GONZALEZ (01)

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

On or about January 26, 2018, in the Northern District of Texas, Fort Worth Division, the defendant, Jose Bryan GONZALEZ, who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, did willfully receive the following firearm: a Ruger, Model LCP, .380 caliber, pistol, bearing serial number 371916328, in violation of 18 U.S.C. § 922(n).

I, Special Agent (SA) A. Alexander, affiant, under oath, duly state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, assigned to the Fort Worth Field Office in the Dallas Field Division. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information in the case.

1. During the month of February 2018, I received information regarding numerous multiple sales documented for an individual between January 6, 2018, and January

27, 2018. Review of the ATF multiple sale summaries showed a total of 33 firearms purchased by the same individual between the mentioned dates, primarily at gun shows. Of the firearms purchased, 32 of the 33 were Ruger, Model LCP, .380 caliber pistols.

2. A copy of ATF Form 4473 completed by the individual and transfer fee payment receipt for the purchase of a firearm from Purple Heart Pawn & Gun LLC, located at 4041 McCart Ave, Fort Worth, Texas, on January 26, 2018 was obtained.

While the individual originally bought the firearms online from a website, Purple Heart Pawn & Gun conducted the transfer to the individual. Payment receipt showed that the individual paid \$150.00 in cash for the transfer fees of ten (10) firearms, to include a Ruger, Model LCP, .380 caliber, pistol, bearing serial number 371916328.

3. Review of the security camera footage of the firearm purchase at Purple Heart Pawn & Gun on January 26, 2018, showed the individual arriving at the store with an unknown male, later identified as Jose Bryan GONZALEZ, hereafter referred to as GONZALEZ. The individual presented the store associate with their Texas identification card. The individual filled out the ATF Form 4473 as GONZALEZ stood near. Once the store associates stepped away to the side GONZALEZ handed an unknown item to the individual's right hand. The individual placed the item in the right pocket of their jacket.

4. A short time later, the individual took out cash from the right pocket of their jacket and gave it to the store associate for payment. The individual walked out of the

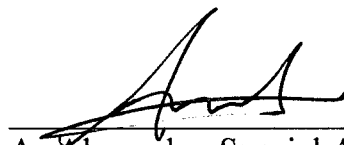
store and GONZALEZ walked behind them, carrying the box containing the firearms. GONZALEZ entered a vehicle with the box of firearms. The individual who had purchased the firearms entered the front passenger side of the sedan, before driving away from the store with GONZALEZ.

5. On March 12, 2018, I was contacted by Purple Heart Pawn & Gun, advising of 9 more Ruger, Model LCP, .380 caliber, pistols, that arrived at the store for transfer, after the individual purchased the firearms online from another website.
6. On March 12, 2018, I conducted a non-custodial interview of the individual who stated they were purchasing the firearms at the direction of GONZALEZ and another person. The purchaser of the firearms continued to state they were in need of money and knew GONZALEZ and another person would pay them money for purchasing firearms for them. They also stated GONZALEZ was with them when the firearms were purchased at the gun show on January 6, 2018, and both GONZALEZ and the other person was with them when they made a firearms purchase at a gun show on January 27, 2018, and would pay them approximately \$15.00 per firearm that was purchased for them.
7. On March 12, 2018, the purchaser of the firearms signed a consent for a search of their cell phone. An initial review of the text messages showed conversation between them and 'Bryan', who was identified as GONZALEZ. On February 22, 2018, GONZALEZ texted the cooperating defendant a link for a gun purchasing website, www.palmettostatearmory.com. GONZALEZ texted the link in order for the individual to set up an account and order nine firearms. On February 26, 2018,

GONZALEZ texted the cooperating defendant inquiring about the status of the order for firearms placed through www.palmettostatearmory.com.

8. Criminal history check for GONZALEZ showed that he was indicted by Tarrant County District Attorney's Office on January 11, 2018, for the felony state charge of Possession of Marijuana > 4 ounce <= 5 lbs, and is presently out on bond.
9. An ATF Interstate Nexus Expert has reviewed the purchasing documents regarding the Ruger, Model LCP, .380 caliber, pistol, bearing serial number 371916328, and determined it was not manufactured in the State of Texas.

Based upon the above facts and circumstances, I believe there is probable cause to believe that Jose Bryan GONZALEZ, who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, did willfully receive the following firearm: a Ruger, Model LCP, .380 caliber, pistol, bearing serial number 371916328, in violation of 18 U.S.C. § 922(n).


A. Alexander, Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Subscribed and sworn to before me on this 14th day of March, 2018 at 2:00
p.m., in Fort Worth, Texas.


HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE